

1204

**BEFORE THE NATIONAL GREEN TRIBUNAL**  
**WESTERN BENCH**  
**I.A. NO. 86 OF 2020**  
**IN**  
**ORIGINA APPLICATION NO. 104 OF 2019**

IN THE MATTER OF:

Nitin Devraj Jaru & Anr.

...Applicants

Versus

Union of India & Ors.

...Respondents

**I N D E X**

S. No.	Particulars	Page Nos.
1.	Index	1204
2.	Counter Affidavit on behalf of Respondent No. 6 M/s. Sal Steel Limited.	1205-1214
3.	<b><u>Annexure – 1</u></b> Copy of Revocation order dated December 13, 2022 passed by Gujarat Pollution Control Board.	1215-1216
4.	<b><u>Annexure – 2</u></b> Copy of No Steel Plate Certificate dated January 19, 2023.	1217
5.	Proof of Service	1218

THROUGH

**SUMIT ATTRI**

**Cyril Amarchand Mangaldas**

**Advocate & Solicitors**

Counsel for the Respondent No. 6

Level 1 & 2, Max Towers, C-001/A,

Sector 16B, Noida – 201 301 U. P.

Ph: +91 0120 66229000 f: +91 0120 6699009

Email: [sumit.attri@cyrilshroff.com](mailto:sumit.attri@cyrilshroff.com)

Place : New Delhi

Dated: January 19, 2023

1205

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
WESTERN BENCH, AT PUNE

IA NO. 86 OF 2020

IN

ORIGINAL APPLICATION NO. 104 OF 2019

IN THE MATTER OF:

NITIN DEVRAJ JARU & ANR.  
APPLICANT

...

VERSUS

UNION OF INDIA & ORS.

... RESPONDENTS

COUNTER AFFIDAVIT ON BEHALF OF RESPONDENT NO. 6 M/S. SAL  
STEEL LIMITED

I, Manish Daulani, S/o. Ramchand Daulani aged about 29 years, working as Company Secretary and being authorized by SAL Steel Limited/Respondent No. 6 do hereby solemnly affirm and say as follows:-

1. That the deponent is the Company Secretary and Authorised Signatory of the Respondent No. 6 and duly authorised to file the present affidavit. I am well acquainted with the facts and circumstances of the case and have gone through the documents pertaining to the matter.
2. The present counter affidavit is being filed on behalf of Respondent No. 6 ("Answering Respondent") in view of the order dated January 4, 2023 passed by the Hon'ble National Green Tribunal, Western Zone Bench, Pune ("Hon'ble NGT") and is for the limited purpose of placing on record the facts and developments to challenge IA No. 86 of 2020 ("Application") filed by the Applicant in the present proceedings. All the submissions made in the application under reply are denied unless specifically admitted. No



For, SAL Steel Limited  
*Manish D.*  
Authorised Signatory



1206

part of the application should be deemed to be admitted for non-traverse or otherwise.

3. It is humbly submitted that Respondent No. 6 has filed counter affidavit to the original application on September 1, 2020 and an additional affidavit dated December 13, 2022. Respondent No. 6 prays that the contents of the counter affidavit and the additional affidavit be read as part and parcel of the present counter affidavit and they are not being repeated herein for the sake of brevity.
4. It is submitted that Respondent No. 6 is a group company of SAL Group, which was established 37 years ago, and the SAL Group is engaged in multiple businesses such as production of Steel & Steel Products, Health Care, Education etc. The Respondent No. 6 is a public listed company which was incorporated in 2003 and a manufacturing facility was established in the year of 2005-2006 at Bharapar Village, Kutch District, Gujarat.
5. It is further submitted that Respondent No. 6's manufacturing facility was established pursuant to a Memorandum of Understanding ("MOU") dated January 15, 2005 entered into with the Government of Gujarat under the Vibrant Gujarat for re-development of Kutch. As per the MoU, the Government of Gujarat had allocated land for establishment of steel plant in the village of Bharapur, Kutch District, Gujarat. The said land had been allotted to the Respondent No. 6 in a heavy industrial zone as had been declared by the State Government. The copy of the MoU dated January 13, 2005 has already been annexed as Annexure R-1 at pages 219 to 222 with the reply dated 01.09.2020 filed by the answering Respondent.
6. It is humbly submitted that Respondent No. 6 had started operation at its plant/ unit in the year 2005-06 and has been complying with all the environmental conditions till present. The Applicants have made bald and unsubstantiated allegations, which are false, baseless, and denied in totality.

  
For, SAL Steel Limited  
Authorised Signatory



1207

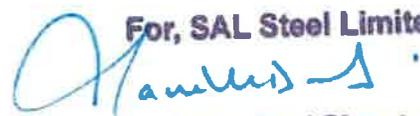
It is humbly submitted that IA 86 of 2020 was filed in 2020, post the filing of the Application, various developments has taken place and they are as follows:

7. The Hon'ble NGT through its order dated March 30, 2022 (corrected on April 4, 2022) had directed the following:

*"10. Accordingly, we constitute a joint Committee comprising of the CPCB, State PCB, District Magistrate, Kutch and the Central Ground Water Authority to give its report on the issues for further consideration of the matter by this Tribunal. The State PCB will be the nodal agency for coordination and compliance. The joint Committee may meet within 15 days, undertake visit to the site, interact with the stakeholders and furnish a factual and action taken report within two months by e-mail at judicial-ngt@gov.in preferably in the form of searchable PDF/ OCR Support PDF and not in the form of Image PDF. If there are any observations against the PP, a copy of the report may also be simultaneously given to the PP for its response, if any which may be filed before the next date. The Committee may consider the justification for the quantity of potable ground/surface water consumption by the Industry and options available such as treated waste water or the desalinated water. The Committee may also ascertain status of utilisation / management plan of fly ash, slag and other waste."*

8. Subsequently, in compliance of the order dated April 4, 2022, a joint committee was constituted by CPCB, GPCB, CGWA and District Magistrate, Kutch, Gujarat comprising of following members:

- (i) Shri M.V Desai, Sub Divisional Magistrate, Anjar, Kutch;
- (ii) Dr. Arvind Kumar Jha, Scientist E, Central Pollution Control Board (CPCB), Regional Directorate (W), Vadodra, Gujarat;

  
For, SAL Steel Limited  
Authorised Signatory



1208

- (iii) Shri K.B. Chaudhari, Regional Officer, Gujarat Pollution Control Board, Regional Office, Kutch (East), Gandhidham, Gujarat;
- (iv) Dr. Subhas Singh, Assistant Hydrologist, Central Ground Water Authority, Ahmedabad.

Thereafter, in furtherance to the investigations conducted by the said joint committee, a Compliance Report dated May 2022 (“**Joint Committee Report**”) with reference to the Respondent No. 6 was submitted by GPCB to the Hon’ble NGT.

9. It is submitted that the joint committee made the following conclusions in the Joint Committee Report in reference to Respondent No. 6:

**“6. Conclusion**

*The unit has taken measures to improve solid waste management and 500 TPD kiln was found in compliance of emission standards prescribed in CC&A. However,*

- (i) *The unit has violated CRZ notification 2011 and accordingly Rs. 12. 60 lakhs is payable as environmental compensation in lieu of illegal disposal of fly ash in CRZ area.*
- (ii) *At present, the unit does not have NOC from CGWA for withdrawal of saline ground water but their application for renewal of NOC is in-process at CGWA.*
- (iii) *Based on present condition, there is no alternative sources of water for plant other than GWIL and saline groundwater. GWIL water supply is designed for domestic and industrial use. However, the unit should consider seawater desalination plant as consistent source (with time targeted action plan submission and implementation) and gradually reduce their dependency on existing source namely GWIL and ground water. This will not*

For, SAL Steel Limited  
*[Signature]*  
Authorised Signatory



1209

*only improve availability of water for common citizen by GWIL but also positively impact groundwater.*

- (iv) The unit should install desulphurization system and augment ESP for captive power plant boiler as it uses lignite resulting in exceeding emissions w.r.t. standards prescribed from the power plant stack.*
- (v) The unit should effectively take measures to control fugitive emissions with time targeted action plan in the process area, improve raw material storage area by wind breaking wall or three tier plantation and improve solid waste utilization to achieve 100% use of ash and slag. Scope exists in terms of concrete block manufacturing and use in infrastructure projects apart from cement industry.*
- (vi) Dry fog system should be installed all along the conveyor belt and fogger system should be used at all fugitive emission vulnerable sources instead of water sprinkling through tankers. Improved housekeeping clubbed with fogger guns will be more sustainable and effective than heavy water consuming vehicle mounted sprinklers or fixed sprinklers.*
- (vii) The transfer junctions of all conveyor belts and material transfer points should be provided with dust extraction system.*
- (viii) Three tier plantation all along the plant boundary is required to contain the fugitive emissions.*
- (ix) Construct concreted boundary wall all along the existing fly ash dump area and reduce dependency on land disposal of fly ash.*
- (x) Install Sewage treatment plant comprising of atleast primary and secondary treatment so that treated sewage can be reused.*
- (xi) Rainwater harvesting may be practiced by the unit."*

10. Once the committee report has been filed with the above-mentioned specific findings the application under reply deserves dismissal at the outset.

For, SAL Steel Limited  
*[Signature]*  
Authorised Signatory



1210

11. It is humbly submitted that the Respondent No. 6 has taken all the necessary measures in compliance to the conclusions passed in the Joint Committee Report. The same has been submitted by the Respondent No. 6 to the Hon'ble NGT by way of a progress report dated October 10, 2022 and the Additional Affidavit dated December 13, 2022. It is humbly submitted that GPCB / Respondent No. 2 has issued the latest revocation order dated December 13, 2022 for six months in view of the compliances made by Respondent No. 6. A copy of the revocation order dated December 13, 2022 issued by GPCB to Respondent No. 6 is annexed herewith and marked as **Annexure 1**.
12. That the contents of the Application are being denied in the entirety. The Respondent No. 6 has been conducting its operations legally and in compliance of the conditions of the Environment Clearance, Consent to Operate. It is humbly submitted that the Respondent No. 6 currently possesses a valid NOC from CGWA for withdrawal of Saline Ground Water and it is valid from a period of December 13, 2021 till December 12, 2024. Copy of the NOC has been annexed as Annexure 25 with the Additional Affidavit (@ pg. 1136-1137).
13. Respondent No. 6 has also entered into agreement with Gujarat Water Industrial Limited ("GWIL") for their requirement of water. Copy of the Agreement dated September 8, 2021 entered into between GWIL and Respondent No. 6 for supply of Narmada water has been annexed as Annexure 26 with the Additional Affidavit (@ pg. 1138-1143).
14. It is humbly submitted that the Applicants have filed the present Application for completely mala fide reasons, for the purpose of harassing the Applicants and have not come to the Hon'ble Tribunal with clean hands. The Applicants belong to the village Kidana which is around five kilometres from the plant

For, SAL Steel Limited  
*Handwritten Signature*  
Authorized Signatory



1211

site of Respondent No. 6. The Applicants have a business of transport and water supply. Further, the Applicants own the land adjoining the factory of the Answering Respondent. The Applicants have been repeatedly harassing the Answering Respondent by various means, including by unauthorizedly entering the premises of the Respondent No. 6 on several occasions, and illegally obstructing the Respondent No. 6 from carrying on its day to day operations.

15. It is submitted that the Applicants are habitual miscreants who have been coercing and forcing the Respondent No. 6 to purchase the land adjoining the factory of the Respondent No. 6 through various violent means. In fact, the criminal antecedents of the Applicant are noted in the criminal complaints filed against the Applicants for various such offences, including forcibly entering the company plant and committing acts of violence, including against police personnel. In fact few Applicants and other associates were not granted bail in the lower court, and had to approach the Hon'ble Third Additional Session Judge, Gandhidham- Kutch for grant of conditional bail.
16. It is humbly submitted that on March 30, 2019 and May 24, 2019, the Applicants and their associates forcibly entered the premises of the manufacturing facility belonging to the Respondent No. 6, and created havoc by, inter alia, forcibly operating on the machinery and boilers. It is submitted that the acts of the Applicants and their associates gravely risked the functioning of the Respondent No. 6, as such incorrect operation of the boiler and machinery could have resulted in disaster costing the life of hundreds of persons working in the plant of the Respondent No. 6 as well as residents of the nearby village. It is further submitted that the Deputy Police Superintendent, Anjar Division on July 18, 2019, submitted a letter to the Police Superintendent stating that the Respondent No. 6 had sought police protection for the purpose of conducting fencing work, which was

For, SAL Steel Limited  
*[Signature]*  
Authorised Signatory



1212

recommended by the Executive Magistrate and Revenue Officer of Gandhidham as well as the police inspector of Kandla Marine Police Station, and that the Deputy Police Superintendent had opined to the same.

17. It is submitted that in addition to the aforementioned illegal obstructions, the Applicant and their associates have repeatedly tampered with and obstructed the usage of water by the Respondent No. 6, which is legally obtained by way of a pipe line linked to the Narmada, which is at a distance of 18 kilometers from the premises of the Respondent No. 6. The Applicants have repeatedly broken the pipeline, and diverted water from therein for personal usage, and sale of the same. It is humbly submitted that the Respondent No. 6 has complained of such illegal diversion of water and obstruction of usage of water by the Applicants and their associates to the authorities on several occasions. Copy of the police complaints has been annexed as Annexure R6, R7, R8, and R9 to the Counter Affidavit (@ pg. 349-365).
18. As regards the allegation of illegal dumping of fly ash by the Respondent No. 6, it is humbly submitted that one farmer Mr. Hasim A Shaikh approached the Respondent No. 6 for the development of their land using fly ash for their land filling, which was given by the Respondent No. 6 at no cost. However, after GPCB raised objection for the same, the Respondent No. 6 lifted the entire fly ash at its own cost in the presence of Mamlatdar Gandhidham and GPCB Officials, and the same was discussed in the CRZ Committee at District Collector and Magistrate office, and this was also confirmed by the GPCB in the revocation order dated December 12, 2019.
19. It is submitted that since the 2019, the entire generation of fly ash is being sent to the cement producer or block manufacturer company or used for the Respondent No. 6's own block making. Further, the old fly ash which was lying in the premises of the Respondent No. 6, the same was covered with

For, SAL Steel Limited  
*Handwritten Signature*  
Authorised Signatory

1213

greet stone & pcc, over which sand filling has also been done to develop a green belt in the Manufacturing facility of Respondent No. 6.

20. Thereafter, Respondent No. 6 informed GPCB that the total quantity of remaining dumped fly ash at Tuna Vadi had been lifted by way of the form for permanent revocation of the closure order enclosed in the letter dated September 23, 2019 written by the Respondent No. 6 to GPCB. The lifting of fly ash was also witnessed by Mamalatdar, Gandhidham and a GPCB officer. It is pertinent to mention here that in order dated November 17, 2022 at Para 10 this Hon'ble Tribunal has recorded the statement of the senior counsel for the answering Respondent No.6 that R-6 is willing to pay the compensation of 12.60 lakhs as calculated by GPCB.
21. It is humbly submitted that Respondent No. 6 has been running its operations for the last 15 years and are employing more than 1000 people. Residents of the nearby villages are also getting employment because of Respondent No. 6. The Applicants are transporter and were doing transportation for Respondent No. 6 with a different name. The Applicants pressurized the Respondent No. 6 to do business with them at a very hefty price which was not agreed by Respondent No. 6 and therefore, the Applicants raised the issue of pollution and tried to operate boiler on their own after illegally entering into the premises of Respondent No. 6. Criminal complaints were lodged by Respondent No. 6 against the Applicants for illegally entering the premises of Respondent No. 6.
22. It is humbly submitted that the allegation of erection of a separate manufacturing unit of steel plates by the Respondent is completely untenable and baseless. It is submitted that the Respondent No. 6 has received a statutory certificates from the chartered accountants that they have not even produced even a single kilogram of steel plate as alleged by the Applicants. The Respondent cannot manufacture any new product without statutory

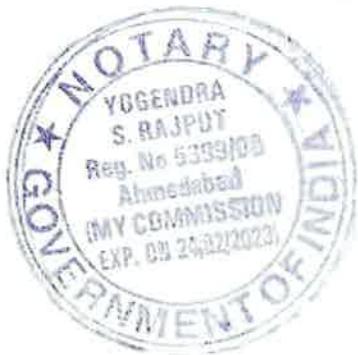
For, SAL Steel Limited  
*[Signature]*  
Authorised Signatory.



1214

approvals. It is submitted that the Applicant without any basis is trying to raise new issues and allegations in the present original application and expanding the scope of the application which is not permissible. Copy of the certificate issued by the Chartered Accountant to the Respondent No. 6 is annexed herewith and marked as **Annexure 2**.

23. In view thereof, it is humbly submitted that this Hon'ble Tribunal may be pleased to dismiss the present Application along with the Original Application as Respondent No. 6 has been fully compliant with all rules and regulations.



For, SAL Steel Limited  
*[Signature]*  
Authorised Signatory  
DEPONENT

VERIFICATION

I, the above-named deponent do hereby verify that the contents of the above affidavit are true and correct to my knowledge. No part of it is false and nothing material has been concealed therefrom.

Verified at Ahmedabad on this 19 JAN 2023 day of JAN, 2023



For, SAL Steel Limited  
*[Signature]*  
Authorised Signatory  
DEPONENT



19 JAN 2023



ANNEXURE-1' 1215



## GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,  
GANDHINAGAR - 382010,  
(T) 079-23232152

By R.P.A.D.

**REVOCATION OF DIRECTION ISSUED UNDER SECTION - 31 (A) OF THE AIR (PREVENTION AND CONTROL OF POLLUTION) ACT-1981.**

WHEREAS you are having an industrial plant for manufacturing of Sponge Iron, ferrous alloys, MS/SS ingots round, flat, plate, coil, angle etc survey no. 245/P, Vill: Bharapar, Ta. Gandhidham, Dist. Kutch.

AND WHEREAS, the Board had granted you consent under the provision of Air Act vide CCA order no. AWH-113919 valid up to 03/05/2026 for manufacture items / products subject to the conditions mentioned therein.

AND WHEREAS, the Board had issued closure direction under section 31 (A) of the Air (Prevention and Control of Pollution) Act-1981 vide this office order dated 29/04/2019. Subsequently on the basis of compliance report submitted by you and compliance monitoring report of Regional office, the said closure order was revoked vide this office order dated 15/05/2019 & trial run granted for three months.

AND WHEREAS, subsequently based on non compliance observed, the Board had re-implemented closure direction under section 31 (A) of the Air (Prevention and Control of Pollution) Act-1981 vide this office order dated 30/07/2019.

ANDWHEREAS, subsequently based on compliance report submitted by you & monitoring report of Regional office, this office had revoked the said closure order vide this office order dated 12/12/2019, the said revocation order is time to time further extended by this office based on industry's submission & monitoring report of regional offices. Latest revocation was granted on 10/06/2022 and granted trial run for six months with conditions mentioned therein.

ANDWHEREAS, unit has submitted Bank Guarantee of Rs. 15 Lakhs valid up to 20/05/2023 to assure compliance of direction issued along with revocation application.

ANDWHEREAS, unit has paid interim Environment Compensation (EDC) of Rs. 18 Lakhs on 09/07/2020.

AND WHEREAS, you have submitted compliance of revocation order conditions with supporting document on 25/11/2022 & latest on 10/12/2022 and requested for permanent revocation of the closure direction.

ANDWHEREAS, based on your submission, your industry was monitored by officers of Board on **05/12/2022 & 07/12/2022 under the Air Act, 1981**. During inspection plant was in operation & observed that;

1. Unit has submitted record on weekly basis regarding fly ash generation and disposal details including end user party name, quantum of fly ash disposal against new fly ash generation & old stock of fly ash.
2. Water sprinkling & water fogging facility system at different location of plant premises.
3. Coal and lignite observed stored in storage shed.
4. Ash block making machine is observed in operation & fly ash is observed stored within premises.
5. Unit is observed in operation with CPP & production of sponge iron, Ferro Alloys are going on.

Page 1 of 2

Clean Gujarat Green Gujarat

Website : <https://gpcb.gujarat.gov.in>

TRUE COPY

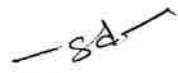
1216

6. 110 TPH AFBC Boiler, 100 TPD SI Kiln with WHR Boiler (10.3 TPH) & one Electric Arc Furnace are observed in operation with its provided APCM.
7. Online monitoring system reading is observed: for 500 TPD SI Kiln: PM-72 mg/NM<sup>3</sup>, SO<sub>2</sub>-28 mg/NM<sup>3</sup> & NOx-33 mg/NM<sup>3</sup>.
8. Industry has submitted last three months record of daily generation & disposal of fly ash including end user party name, quantum of fly ash disposal against new fly ash generation & old stock of fly ash.

Under the above circumstances, I T.C. Patel, Unit Head, Gujarat Pollution Control Board revokes the closure direction under section 31 (A) of the Air (Prevention and Control of Pollution) Act-1981 further for **six months** from date issue of this order with following conditions;

1. The Unit shall abide with orders / directions issued by Hon'ble NGT in the matter of OA no. 104 / 2019 (WZ).
2. Industry shall dispose off remaining quantity of fly ash through authorise / consented cement industries, by constructing fly ash bricks/blocks, etc. within revocation period & carry out regular monitoring of ground water in & around dump as per MoEF & CC, New Delhi OM dated 28/08/2019 & submit progress report to RO.
3. Industry shall comply with CCA conditions.

For and on behalf of  
GUJARAT POLLUTION CONTROL BOARD

  
(T.C. Patel)  
Unit Head

Date:

NO: PC/ CCA- KUTCH- 345(18) /GPCB ID: 18021/  
Issued To,  
M/s. Sal Steel Ltd.  
Survey no. 245/P,  
Vill: Bharapar,  
Ta: Gandhidham, Dist: Kutch.

Copy To:

- ✓ 1) The superintendent Engineer (SE)  
Paschim Gujarat Vij Company Limited (PGVCL),  
Circle Office, Nr Bus Station  
Ta - Anjar, Dist - Kutch 370110...

You are requested to continue of electricity for **six months** from date of issue of this order to the industrial Plant of **M/s. Sal Steel Limited**, at **Survey no. 245/P, Vill: Bharapar, Ta. Gandhidham, Dist. Kutch** and intimate to us accordingly.

For and on behalf of  
GUJARAT POLLUTION CONTROL BOARD

  
(T.C. Patel)  
Unit Head

Page 2 of 2

  
TRUE COPY

Outward No: 690272, 13/12/2022

ANNEXURE - 2' 1217



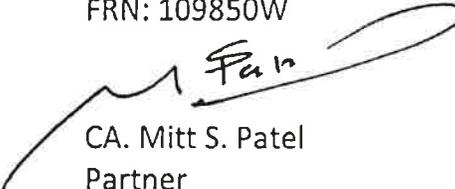
**GMCA & Co.**  
Chartered Accountants

To whom so ever it may concern

We hereby certify that M/s S.A.L. Steel Limited , having registered office at 5/1, Shreeji House, 5th Floor, B/H M.J. Library , Ashram Road , Ahmedabad , Gujarat having unit at: Bharapar, Tal Gandhidham, Dist.- Kutch, Gujarat-370201 has not produced steel plate till date and there is no Steel Plate production plant in the Company.

For, G M C A & Co.  
Chartered Accountants  
FRN: 109850W



  
CA. Mitt S. Patel  
Partner  
Membership No. 163940  
UDIN: 23163940BGPZFT6943

Date: 19/01/2023  
Place: Ahmedabad

  
**TRUE COPY**

Address : 101, Parishram, 5-B, Rashmi Society, Nr. LG Showroom, Mithakhali Six Roads, Navrangpura, Ahmedabad – 380009  
☎ 079-40037372 ✉ [gmca1973@gmail.com](mailto:gmca1973@gmail.com)

Chand, Tara

**From:** Anand Vishwakarma, Ritu  
**Sent:** 19 January 2023 18:23  
**To:** maulik@nanavati.com; mansi@eldfindia.com; anirudhh1448@gmail.com; atuljpathak@gmail.com  
**Cc:** Attri, Sumit; Chand, Tara  
**Subject:** Counter affidavit on behalf of R-6 in IA 86 of 2020  
**Attachments:** Counter Affidavit in IA No. 86 of 2020.pdf

Dear all,

Please find attached by way of advance service the copy of the counter affidavit being filed on behalf of Respondent No. 6 - SAL Steel Limited in IA No 86 of 2020 in OA No 104 of 2019.

Kindly acknowledge the receipt of mail.

Warm regards  
Ritu Anand  
Advocate for Respondent No 6  
Cyril Amarchand Mangaldas

ritu anand vishwakarma  
senior associate



cyril amarchand mangaldas  
ahead of the curve

India's  
leading law  
firm

cam dispute  
resolution

Cyril Amarchand Mangaldas  
Advocates & Solicitors

Level 1 & 2, Max Towers, C-001/A, Sector 16 B, Noida – 201 301, Uttar Pradesh

Presence in Mumbai | Bengaluru | Ahmedabad | Hyderabad | Chennai | Kolkata  
M+91 8448391283 T+91 120 669 9000 F+91 120 669 9009 W www.cam.ac



© 2023 Cyril Amarchand Mangaldas. All rights reserved. This e-mail and any files transmitted with it are confidential and intended solely for the individual named. If you have received this e-mail by mistake, please notify the sender immediately by e-mail. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system.

Please consider the environment before printing this e-mail